

**McMANIMON, SCOTLAND & BAUMANN, LLC**

75 Livingston Avenue, Suite 201

Roseland, NJ 07068

(973) 622-1800

Anthony Sodono, III ([asodono@msbnj.com](mailto:asodono@msbnj.com))

Michele M. Dudas ([mdudas@msbnj.com](mailto:mdudas@msbnj.com))

Sari B. Placona ([splacona@msbnj.com](mailto:splacona@msbnj.com))

*Counsel to Anthony Sodono, III, Temporary Receiver for Traders Global Group Inc.,  
a New Jersey corporation, d/b/a "My Forex Funds"; Traders Global Group Inc.,  
a Canadian business organization; and Murtuza Kazmi*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

COMMODITY FUTURES TRADING  
COMMISSION,

Plaintiff,

v.

TRADERS GLOBAL GROUP INC., a New  
Jersey corporation, d/b/a "My Forex Funds";  
TRADERS GLOBAL GROUP INC., a  
Canadian business organization; and  
MURTUZA KAZMI,

Defendants.

Civil Action No. 3:23-cv-11808 (ZNQ)(TJB)

Return Date: December 4, 2023

**NOTICE OF MOTION TO APPROVE INTERIM FEES AND EXPENSES THROUGH  
OCTOBER 31, 2023, TO: (1) McMANIMON, SCOTLAND & BAUMANN, LLC,  
COUNSEL TO TEMPORARY RECEIVER; AND (2) NORTON ROSE FULBRIGHT US  
LLP AND NORTON ROSE FULBRIGHT CANADA LLP, SPECIAL COUNSEL TO  
TEMPORARY RECEIVER**

TO: ALL PARTIES ON ANNEXED SERVICE LIST

**PLEASE TAKE NOTICE** that on December 4, 2023, at 9:00 a.m., or as soon thereafter  
as counsel may be heard, Anthony Sodono, III, Court-Appointed Temporary Receiver  
("Temporary Receiver"), shall move before the Honorable Zahid N. Quraishi, U.S.D.C.J., United  
States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S.  
Courthouse, 402 East State Street, Trenton, New Jersey 08608, for entry of an Order Authorizing

and Approving and for Payment of Interim Fees and expenses Through October 31, 2023, to: (1) McManimon, Scotland & Baumann, LLC, Counsel to Temporary Receiver; and (2) Norton Rose Fulbright US LLP and Norton Rose Fulbright Canada LLP, Special Counsel to Temporary Receiver (“**Motion**”).

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, the Temporary Receiver submits an application and certifications of Sari B. Placona, Esq., and Eric Daucher, Esq.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States District Court in accordance with L. Civ. R. 71(d)(2).

**PLEASE TAKE FURTHER NOTICE** that unless an objection is timely filed and served, the Motion shall be deemed uncontested in accordance with L. Civ. R. 78(1(b), and the relief may be granted without a hearing.

**PLEASE TAKE FURTHER NOTICE** that a proposed order granting the relief requested herein is submitted herewith and made part of the Motion.

**McMANIMON, SCOTLAND & BAUMANN, LLC**  
*Attorneys for Anthony Sodono, III Temporary Receiver*

Dated: November 9, 2023

By: /s/ Anthony Sodono, III  
Anthony Sodono, III

**COMMODITY FUTURES TRADING COMMISSION**  
**vs. TRADERS GLOBAL GROUP INC., ET AL.**

**Service List**

Ashley J. Burden, Esq.  
Division of Enforcement  
U.S. Commodity Futures Trading  
Commission  
77 West Jackson Blvd., Ste. 800  
Chicago, IL 60604  
[aburden@CFTC.gov](mailto:aburden@CFTC.gov)  
*On Behalf of Plaintiff*

Elizabeth M. Streit, Esq.  
U.S. Commodity Futures Trading  
Commission  
500 W. Monroe Street, Ste. 1100  
Chicago, IL 60661  
[estreit@cftc.gov](mailto:estreit@cftc.gov)  
*On Behalf of Plaintiff*

Katherine Paulson, Esq.  
Division of Enforcement  
U.S. Commodity Futures Trading  
Commission  
77 West Jackson Blvd., Ste. 800  
Chicago, IL 60604  
[kpaulson@cftc.gov](mailto:kpaulson@cftc.gov)  
*On Behalf of Plaintiff*

Anthony J. Staltari, Esq.  
Quinn Emanuel Urquhart & Sullivan, LLP  
51 Madison Avenue, 22<sup>nd</sup> Fl.  
New York, NY 10010  
[Anthonystaltari@quinnemanuel.com](mailto:Anthonystaltari@quinnemanuel.com)  
*Attorneys for Receivership Defendants*

Michael Shaheen, III, Esq.  
Quinn Emanuel Urquhart & Sullivan, LLP  
1300 I Street NW, Ste. 900  
Washington, DC 20005  
[michaelsaheen@quinnemanuel.com](mailto:michaelsaheen@quinnemanuel.com)  
*Attorneys for Receivership Defendants*

Dakota Speas, Esq.  
Quinn Emanuel Urquhart & Sullivan, LLP  
865 S. Figueroa Street, 10<sup>th</sup> Fl.  
Los Angeles, CA 90017  
[dakotaspeas@quinnemanuel.com](mailto:dakotaspeas@quinnemanuel.com)  
*Attorneys for Receivership Defendants*

Michael V. Rella, Esq.  
Davis Wright Tremaine LLP  
1251 Avenue of the Americas, 21<sup>st</sup> Floor  
New York, NY 10020  
[michaelrella@dwt.com](mailto:michaelrella@dwt.com)  
*Attorneys for Non-Party Movant Stripe, Inc.*  
*Filed Notice of Appearance*

Eric Daucher, Esq.  
Norton Rose Fulbright US LLP  
1301 Avenue of the Americas  
New York, NY 10019-6022  
*Special Counsel to Temporary Receiver*